



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue
Seattle, WA 98101

January 14, 2008

Reply to
Attn Of: ETPA-088

Ref: 05-074-AFS

Frank Robert, Planning Staff
Tongass National Forest
Wrangell Ranger District
PO Box 51
Wrangell, AK 99929-0051

Dear Mr. Robert:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (DEIS) for the **Navy Timber Sale** (CEQ No. 20070503) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures we evaluate the document's adequacy in meeting NEPA requirements.

The Navy Timber Sale project area is located on central Etolin Island, approximately 22 miles southwest of Wrangell Island and is within the Wrangell Ranger District of the Tongass National Forest, in southeast Alaska. The DEIS proposes five action alternatives for harvesting timber, and one no-action alternative. The action alternatives range from 18.7 to 97.9 million-board feet (MMBF) of timber for harvest in the Navy project area. Major issues identified during the scoping process included timber supply and economics, old-growth reserves, wildlife habitat fragmentation, inventoried roadless areas, and road construction in the Navy Watershed.

Alternative D is identified as the Forest Service's (FS) Preferred Alternative, harvesting 36 MMBF of timber on 973 acres and building 5.7 miles of new road and 5.3 miles of temporary road. All temporary roads would be decommissioned after the timber sale. Timber would be removed by cable, shovel, and helicopter yarding systems. The existing log-transfer facility (LTF), Anita Bay would be used to transport logs. The Preferred Alternative would also convert 1,190 acres of old-growth stands to an even-aged condition, and 1,339 acres to an uneven aged condition.

Based on our review, we have rated the DEIS "EC-2", Environmental Concerns--Insufficient Information, due to the potential for water quality impacts, particularly in the Anita Creek, Quiet Creek, and Kindergarten Lake watersheds, as well as destruction of relatively high amounts of Productive Old Growth (POG) habitat. The Preferred Alternative does, however, develop fewer road miles than three other action alternatives, does not impact or create a new LTF in the Navy watershed, and is ranked highest, along with Alternative F, in addressing the timber supply and economics issue. A copy of our rating and a summary of our comments will be published in the Federal Register. An explanation of our rating system is enclosed for your information. We also request that the FEIS provide certain clarifying information regarding the Preferred Alternative, as discussed below.

In our scoping letter on December 21, 2005, EPA requested that the FS include an environmental analysis of the existing LTF (Anita Bay), as well as the applicable general permit requirements and monitoring results, to demonstrate baseline conditions for the area with respect to sediment and bark deposition and adjacent aquatic habitats that may be impacted. This information could not be found in the document. We also requested that a discussion of current funding for road maintenance and culvert replacement efforts in context of the planned new and temporary roads be included. This information was limited. *We recommend that the FEIS include additional information on both of these subjects.*

The DEIS does include a good summary of the tribal consultation activities that took place during the scoping and preparation of the document. The issue of Environmental Justice (EJ), however, does not appear to be addressed outside of the discussion of ANILCA 810 requirements. Please see EPA's scoping letter to see our recommendations regarding the development of an EJ analysis. *We recommend that such an analysis be included in the FEIS.*

Purpose and Need

The DEIS states that the Purpose and Need for the project is to: 1) manage timber to achieve goals of the 1997 Forest Plan, to accomplish the desired conditions prescribed in the Land Use Designations (LUDs); 2) assist in providing a continuous wood supply to meet society's needs; and 3) contribute to the job market and economy of southeast Alaska. This is a broad statement that could be achieved through alternatives considered through a much wider range of timber sale/harvest activities in southeast Alaska than what is presented in the DEIS. *EPA recommends that the FS revise the Purpose and Need statement to reflect the specificity of the goals of the Navy Timber Sale in the broader context of the Forest Plan, or expand the range of alternatives to cover the "full spectrum" of possible alternatives.*

Water Quality and Cumulative Impacts

EPA recognizes that the Preferred Alternative includes important Best Management Practices (BMPs) that reduce water quality impacts (e.g., riparian management areas, felling logs away from streams, removing the most landslide prone units from harvest), and provides analysis of the proposed action relative to forest plan standards and guidelines in a clear manner. We also appreciate the clarity of analysis presented in the DEIS.

However, the DEIS indicates that although little to no water quality monitoring has been completed in the project area, impacts that result from timber harvesting activities are known (increase in temperature, sediment increase, destruction of aquatic habitat, etc.). *EPA recommends minimal baseline monitoring prior to any timber harvest activity in the project area. We also recommend that the FEIS:*

- *Prohibit harvest from slopes greater than 72%, even if on-site slope stability analysis has been conducted (Alternative D has 75 units (160 acres) of slopes greater than 72%);*
- *Consider only uneven-age or two-age management to reduce cumulative watershed impacts; and*
- *Consider the selection of Alternative F to reduce the risks to sedimentation and water yield, particularly for the Anita Creek, Quiet Creek, and Kindergarten Lake Creek watersheds.*

Preferred Alternative

In general, EPA supports the consideration of any alternative or modified alternative that can meet project need and FS requirements, while avoiding or further minimizing environmental impacts, and particularly impacts to water quality. EPA continues to support alternatives that are consistent with the Clean Water Act 404(b)1 guidelines in that they represent the least environmentally damaging practicable alternative (LEDPA). *We recommend that the FS consider selecting Alternative F in its FEIS and Record of Decision (ROD) since this alternative does not require the construction of any new or temporary roads in Inventoried Roadless Areas, it ranks first in the FS comparison for economics, does not include any activity in the Navy Watershed, and causes the least amount of wildlife habitat fragmentation among the action alternatives.*

Specific Comments

Below are specific comments on readability, or suggestions for edit or correction:

- *Pages in the Table of Contents (pg. i) for the Summary are incorrectly numbered.*
- *Executive Summary incorrectly lists Final EIS, instead of Draft EIS, in title.*
- *Pg 1-11—States four issues identified in scoping, but five issues were actually identified.*
- *Pg. 3-113—First two paragraphs under “Analysis Area” section are duplicated.*

Thank you for the opportunity to provide comments on the DEIS. If you have any questions, you may contact Jennifer Curtis of my staff at (907) 271-6324 or curtis.jennifer@epa.gov.

Sincerely,

/s/

Christine Reichgott, Manager
NEPA Review Unit

Enclosure